

EXHIBIT 27

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF DELAWARE; STATE OF CALIFORNIA; STATE OF COLORADO; STATE OF ARIZONA; STATE OF CONNECTICUT; DISTRICT OF COLUMBIA, STATE OF HAWAI'I; STATE OF ILLINOIS; OFFICE OF THE GOVERNOR *ex rel.* Andy Beshear, in his official capacity as Governor of the COMMONWEALTH OF KENTUCKY; STATE OF MAINE; COMMONWEALTH OF MASSACHUSETTS; PEOPLE OF THE STATE OF MICHIGAN; STATE OF MINNESOTA; STATE OF NEVADA; STATE OF NEW JERSEY; STATE OF NEW MEXICO; STATE OF NEW YORK; STATE OF NORTH CAROLINA; STATE OF OREGON; JOSH SHAPIRO, in his official capacity as Governor of the COMMONWEALTH OF PENNSYLVANIA; STATE OF RHODE ISLAND; STATE OF VERMONT; STATE OF WASHINGTON; STATE OF WISCONSIN;

Civ. No. 25-cv-01363 (DLB)

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND COMMUNITY SERVICE, operating as AmeriCorps; and JENNIFER BASTRESS TAHMASEBI, in her official capacity as Interim Head of the Corporation for National and Community Service;

Defendants.

DECLARATION OF BRILES JOHNSON

Pursuant to 28 U.S.C. § 1746, I, Briles Johnson, hereby declare as follows:

1. I am a resident of the State of North Carolina. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Office of the Governor as Executive Director of the NC Commission on Volunteerism and Community Service (VolunteerNC). I have served as Executive Director of VolunteerNC since 2021.

3. VolunteerNC is a State-operated agency within the Office of the Governor of the State of North Carolina responsible for overseeing the state AmeriCorps programs, disaster volunteers and donations, the Governor's Page Program, and the Governor's Volunteer Awards. VolunteerNC also promotes volunteer initiatives.

4. As Executive Director, I oversee the Federal Grants that VolunteerNC receives from the Corporation for National and Community Service, operating as AmeriCorps.

5. VolunteerNC AmeriCorps service members provide critical support to North Carolina's schools, nonprofits, and local governments in the form of a cost-effective, well-trained, highly motivated, and flexible workforce.

6. In the 2023–24 service year, for example, 19 AmeriCorps programs in North Carolina were awarded \$12,372,773 in federal funding. This funding supported 600 service members serving communities across North Carolina by tutoring or mentoring children and youth, increasing creativity and arts education in the classroom, assisting first-generation students seeking higher education, improving access to medical care in underserved communities, addressing food insecurity, restoring the environment, increasing local government capacity, responding to

disasters, and more. From October 1, 2023, to September 30, 2024, AmeriCorps service members served 26,251 children and youth, recruited and managed 7,196 volunteers who served 44,493 hours, helped 56 individuals receive job placement or training, and assisted 286 veterans in accessing benefits including stable housing, medical care, and disability benefits.

7. On April 15, 2025, I learned from America's Service Commissions (ASC), a professional association of state service commissions, that all service members of AmeriCorps' National Civilian Community Corps (NCCC) program had been placed on administrative hold status effective immediately and would be eligible for a "compelling personal circumstance" program exit on April 30, 2025. AmeriCorps stated that it was placing these service members on administrative hold because, "In alignment with the Trump-Vance administration priorities and Executive Order 14,222 'Implementing the President's Department of Government Efficiency Cost Efficiency Initiative,' AmeriCorps NCCC is working within new operational parameters that impact the program's ability to sustain program operations."

8. AmeriCorps NCCC service members were serving in the western part of North Carolina addressing Hurricane Helene response and recovery efforts. Specifically, they were assigned to help staff the Multi-Agency Warehouse in Statesville, operated by the North Carolina Department of Public Safety's Emergency Management division, which coordinates distribution of donations to affected communities in western North Carolina. The Warehouse has struggled to backfill volunteers to replace the terminated NCCC service members, resulting in a backlog of incoming donations processing, picking and packing. This has resulted in an overall delay in processing the inventory and disrupted management and operational continuity.

9. The next day, I learned from ASC that upwards of 85 percent of AmeriCorps staff nationwide were also placed on administrative leave, leaving reduced staff in each department.

10. The affected staff include regional staff responsible for programmatic and fiscal support for state-operated programs in North Carolina.

11. The loss of AmeriCorps staff has led to delays in the agency's review of competitive grant applications, as well as delays in approval of formula allocations for the 2025-2026 program year, imperiling VolunteerNC's receipt of funds and implementation of programs for future fiscal years.

12. On April 25, 2025, AmeriCorps informed VolunteerNC that it was terminating 10 grants that VolunteerNC administers. AmeriCorps did not provide VolunteerNC an opportunity to respond or object to the terminations. A copy of that notice is attached as **Exhibit 1** to this declaration.

13. AmeriCorps stated that it was terminating the grants because the awards "no longer effectuate[d] agency priorities." *See Ex. 1.* AmeriCorps further directed VolunteerNC to immediately cease all award activities—including service by AmeriCorps service members—and begin termination and closeout procedures for the programs funded by these 10 grants.

14. Each of the VolunteerNC grants that AmeriCorps terminated were the grants that VolunteerNC awarded in furtherance of state priorities as provided by applicable statutes and regulations.

15. AmeriCorps also instructed VolunteerNC that the only costs that would be allowable going forward for programs funded by these 10 grants are financial obligations that were properly incurred before the effective date of termination and costs that are necessary and reasonable for termination and closeout activities. *See Ex. 1.* As of April 28, 2025, for the current fiscal year ending July 1, the programs that received termination notice had yet to draw down over \$2,671,152 in federal funds.

16. Programs funded by the terminated grants feed school children in rural, low-wealth school districts; keep veterans in North Carolina's cities housed; and help rebuild western North Carolina following the devastation of Hurricane Helene.

17. The State of North Carolina will be irreparably harmed by these terminations.

18. One terminated grant provided funds directly to the State. Among the terminated grants was one to East Carolina University, a constituent institution of the University of North Carolina, for the Collaborative Action in Rural Education Corps (CARE Corps) program.

19. In addition to cutting funds to the State, the termination of the CARE Corps grant shuts off an important recruiting pipeline for future public school employees. CARE Corps supports peer tutoring programs, teachers, and school counselors in several rural school districts in eastern North Carolina. Nearly 73 percent of teaching and counseling CARE Corps service members go on to be employees in North Carolina public schools.

20. The terminations also impair the State's ongoing efforts to recover from the devastation of Hurricane Helene. AmeriCorps terminated *all* of the grants to western North Carolina programs who have played a role in supporting recovery and relief efforts in the aftermath of Hurricane Helene. In the absence of these programs, the State itself will have to expend additional resources to support recovery in western North Carolina.

21. Four programs supported by the terminated grants, Project POWER, Project MARS, Resilience Corps NC, and Project Conserve, provided response and recovery assistance to western North Carolina in the wake of Hurricane Helene. Helene devastated western North Carolina in September 2024, causing at least 107 fatalities and over \$60 billion dollars in damages. Service members serving with these programs assisted with debris removal, repairing storm drainage systems, food and supply donation and distribution support, wellness checks, supply and

meal delivery to homebound or stranded families, shelter staffing, and telephone staffing of the Crisis Cleanup relief website.

22. In addition, service members assisted schools with reopening efforts in affected communities. Project Conserve runs a 100-hour summer program for underprivileged high school youth that will not operate due to termination of their grant. This program engages youth in science and conservation activities, encouraging them to consider a future career in these fields. Project MARS and Project POWER, meanwhile, provide academic assistance, mentoring, and nutrition education services in areas still recovering from the hurricane. Together, they have served 12,703 children between October 1, 2024 to March 31, 2025. School children in western North Carolina, who have already suffered learning loss from an extended period of absence from schools during the storm's initial aftermath, will no longer receive these services.

23. Still other programs provided important services to the people of North Carolina. In the absence of some of those services, the State's welfare systems will be required to fill the void left by the terminated programs.

24. For example, Pamlico Rose Wellness Corps builds and maintains community gardens in Beaufort County, where 96% of students participate in free or reduced lunch programs. Service members improved over 8 acres of land and served at least 95 children and youth in nutrition education programs. One of their community gardens is in the town of Aurora, a town with no grocery store, so residents do not have access to fresh fruits and vegetables. Gardens are expected to yield over 3500 pounds of produce this year but will not have service members to assist with harvesting. Last summer, over 300 pounds of food were delivered to 30 families over a nine-week period in conjunction with a summer read and feed program.

25. Duke NC Literacy Corps, Resilience Corps NC, and Project Conserve, which were each funded by a now-terminated grant, are providing capacity building services to 44 nonprofit and local governments across the state. AmeriCorps member service activities include strengthening volunteer management and recruitment systems, conducting research and mapping community assets to help the organization meet community needs, and leading the development of new programs or services in the organizations where they are serving. These capacity building services will cease with termination of these grant awards.

26. Partnership to End Homelessness, which was funded by a terminated grant, addresses homelessness and hunger with four community partners, including the City of Greensboro. Service members have recruited and managed 411 volunteers, serving 2,841 volunteer hours as of March 31, 2025. They have also prevented the eviction of 149 individuals and distributed 42,753 pounds of food.

27. In total, the terminated grants funded 202 service members that serve 96 distinct nonprofits, schools, and local governments throughout the state. Detailed information about the nine terminated active grants is below. (The terminated Campus Compact-College Renaissance Corps NC program is not active because it has previously declined its grant funds.)

Name of Program	Number of Service Members	Number of Community Partners	Obligated Funds	Remaining Funds
Pamlico Rose Institute for Sustainable Communities Wellness Corps	9	4	\$ 377,872	\$100,490
Children First Communities in Schools Project POWER	14	8	\$309,223	\$37,888
Conservation Trust for North Carolina Resilience Corps	24	22	\$750,807	\$442,128
Duke University NC Literacy Corps	22	9	\$577,834	\$486,151

East Carolina University CARE Corps (Collaborative Action in Rural Education)	55	22	\$728,963	\$326,723
Big Brothers/Big Sisters of Western North Carolina Project MARS	45	14	\$1,000,319	\$418,541
The Servant Center Partnership to End Homelessness	8	4	\$239,760	\$178,525
Conserving Carolina Project Conserve	25	13	\$796,770	\$423,308
NC Commission on Volunteerism Placeholder Grant	0 (funds reserved for the 2025-26 program year)	0	\$137,408	\$137,408
TOTAL:	202	96	\$4,921,956	\$2,551,162

28. VolunteerNC would have urged AmeriCorps to consider this information had it been given notice and the opportunity to comment on the terminations as required by federal regulations.

29. AmeriCorps' recent actions also impose an additional administrative burden on me and my staff at VolunteerNC.

30. VolunteerNC is entirely dependent upon AmeriCorps for notification of its formula grant award allocation, which usually occurs in mid-April. VolunteerNC cannot move forward with selecting formula grantees if it is not known how much the allocation is for the program year.

31. VolunteerNC schedules a Commission meeting for the second Monday in May. The agenda includes Commissioner vote approving the portfolio of formula programs for the coming program year. Commissioners will be unable to approve the formula funding recommendations at the meeting this year because AmeriCorps has not notified VolunteerNC of the formula allocation for the year as well as which programs have been approved for competitive funding.

32. On top of that, VolunteerNC staff have invested extensive time reviewing Executive Orders for applicability to AmeriCorps programs, with no guidance from the AmeriCorps agency on how they should be implemented. Time that is usually spent preparing VolunteerNC events like the Governor's Medallion Award Ceremony and National Volunteer week has been instead used to coordinate with the Governor's Office senior staff and legal team.

33. Late April and early May are critical times for VolunteerNC staff. During this time, VolunteerNC usually reviews competitive grant awards and makes formula funding recommendations for Commissioners to consider at its May meeting.

34. This year, however, VolunteerNC staff have instead had to spend extensive time consulting with legal counsel, reviewing Executive Orders, and assisting subgrantees included on the termination list to mitigate risk and harm to community partner sites and service members who have been affected.

35. Finally, service members funded by these grants will also be harmed by the termination. Many of those service members receive:

- a. A bi-weekly or monthly living allowance;
- b. Health care benefits;
- c. Child care assistance (if eligible); and
- d. An AmeriCorps Education Award, which may be used toward school tuition, most federally approved student loans, or future education costs for up to seven years.

36. Most service members commit to a year of service at their host sites, traveling from their homes, including out of state, to engage in service in North Carolina. Termination of these programs in the middle of the service year will result in severe economic hardship to these service

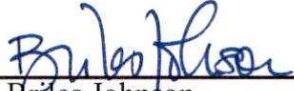
members, who are not eligible for unemployment benefits. Many of these service members live at or below the poverty level and now have unexpected moving costs and must obtain health care, all without adequate notice.

37. Some service members are engaged in workforce development programs which will be prematurely terminated due to grant terminations, resulting in service members not completing certificate programs.

38. VolunteerNC does not have the resources to offer comparable benefits to service members absent AmeriCorps funding. Thus, delays in or loss of AmeriCorps funds will lead to termination of service members' benefits and prevent some or all of VolunteerNC's 202 terminated AmeriCorps service members from continuing to serve their communities.

39. The support that VolunteerNC service members provide to the state of North Carolina is critical and irreplaceable. In particular, VolunteerNC can and has deployed service members on specialized or emergency projects across the state. The loss of a substantial number of VolunteerNC service members due to AmeriCorps' effective closure will be keenly felt.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at Raleigh, NC.



Briles Johnson

Exhibit 1
(Briles Johnson Declaration)

4/26/25, 5:32 PM

[External] Termination Notice of AmeriCorps Award - Trawick, Megan M - Outlook



[External] Termination Notice of AmeriCorps Award

From AmeriCorpsAwardAction <AmeriCorpsAwardAction@americorps.gov>

Date Fri 4/25/2025 7:05 PM

To Trawick, Megan M <megan.trawick@nc.gov>

Cc AmeriCorpsAwardAction <AmeriCorpsAwardAction@americorps.gov>

1 attachment (19 KB)

NC_Commission.xlsx;

You don't often get email from americorpsawardaction@americorps.gov. [Learn why this is important](#)

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Megan Trawick
VOLUNTEERISM & COMMUNITY SERVICES NC COM
116 W Jones St
Raleigh
NC, 27603

RE: Grant Termination

Dear AmeriCorps Award Recipient:

Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.

The provisions at [2 CFR 200.343 – Effects of Suspension and Termination](#) apply. This process ensures the equitable settlement of costs, proper disposition of government property, and mitigation of negative impacts on stakeholders. AmeriCorps staff will initiate an amendment to change the end date of the period of performance effective immediately.

Please immediately notify subrecipients and/or community partners, if applicable, and initiate your internal termination and closeout procedures.

Please review [Closeout Instructions for Grantees](#) to close out this Federal award within 120 days. Please note, there are some close-out actions that indicate that you must submit information to your portfolio manager. Instead of submitting to those individuals, you must instead submit to the following regional mailboxes:

- MidAtlantic@americorps.gov (DC, DE, MD, NJ, PA, PR, VA, VI, WV)
- Midwest@americorps.gov (IL, IN, KY, MI, OH)
- Mountain@americorps.gov (AZ, CO, ID, MT, NM, UT, WY)
- NorthCentral@americorps.gov (IA, MN, WI, ND, SD, NE, KS, MO)
- Northeast@americorps.gov (CT, MA, ME, NH, NY, RI, VT)

4/26/25, 5:32 PM

[External] Termination Notice of AmeriCorps Award - Trawick, Megan M - Outlook

- SouthCentral@americorps.gov (AR, LA, MS, OK, TX)
- Southeast@americorps.gov (AL, FL, GA, NC, SC, TN)
- West@americorps.gov (AK, AS, CA, CNMI, GU, HI, NV, OR, WA)

Costs after termination are allowable if:

- (a) The costs result from financial obligations which were properly incurred before the effective date of termination, and
- (b) costs are for necessary and reasonable termination and closeout activities.

Please follow the program specific instructions below, based on the type of award that is being terminated.

AmeriCorps State and National

State commissions and prime grantees should immediately notify subgrantees, operating sites, and members and follow grant close-out procedures. All member activities should cease immediately. Members should be exited for compelling personal circumstances (CPC). The program should document that the member was exited for compelling personal circumstances due to the agency's termination of the grant and program closure. If possible, the program should try to have the member transferred to another program. If this is not possible, the program should note in the CPC documentation that member reassignment was not an option.

Jennifer Bastress Tahmasebi
Interim Agency Head

Grant Number	Application ID	Organization	Corporate Project Code	Project	Wellness Corps	STATE	Organization State	Federal/Familial
22ACFHNCO020002	24ACZG61333	Panhandle Rose Institute for Sustainable Communities					NC	\$377,872
21AFHNCO010009	24ACZG63712	CHILDREN FIRST COMMUNITIES IN SCHOOLS OF BUNCOMBE COUNTY INC.				STATE	NC	\$305,233
21AFHNCO10039	24ACZG64029	CONSERVATION TRUST FOR NORTH CAROLINA				STATE	NC	\$750,807
21AFHNCO10038	24ACZG64236	Duke University				STATE	NC	\$527,814
21AFHNCO010001	24ACZG64085	EAST CAROLINA UNIVERSITY				STATE	NC	\$726,963
24AFHNCO010004	24ACZG64872	Campus Compact				STATE	NC	\$13,590
24AFHNCO010005	24ACZG64817	BIG BROTHERS/BIG SISTERS OF WESTERN NORTH CAROLINA INC				STATE	NC	\$103,319
24AFHNCO010006	24ACZG66510	VOLUNTEERISM & COMMUNITY SERVICES INC COM				STATE	NC	\$137,408
24AFHNCO10003	24E5Z73414	THE SERVANT CENTER, INC				EAS	Partnership to End Homelessness (PEEH)	\$239,760
24AFHNCO010002	24E5Z73755	Conserving Carolina				EAS	AmeriCorps Project Conserving EAS	\$196,770